

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

SVETLANA LOKHOVA

Plaintiff,

V.

STEFAN A. HALPER

Defendant.

Case 1:20-cv-01603-LMB/MSN

## CONSENT MOTION TO WITHDRAW AS COUNSEL

Steven S. Biss, counsel for Plaintiff, Svetlana Lokhova, moves to withdraw as counsel in this matter:

1. After the Fourth Circuit Court of Appeals entered its mandate, Plaintiff obtained new counsel, Leslie McAdoo Gordon, Esquire, McAdoo Gordon & Associates, P.C.. Ms. Gordon has entered her appearance and is actively representing Plaintiff.

2. Rule 1.16(b) of the Virginia Rules of Professional Conduct, in pertinent part, provides that “a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client”. Here, withdrawal is authorized pursuant to Rule 1.16(b).

3. Plaintiff and Ms. McAdoo have been notified of Mr. Biss's intent to withdraw, and both expressly consent.

4. Mr. Biss also consulted with Counsel for Defendant Halper. Counsel for Halper consents.

For the reasons stated above, Mr. Biss respectfully requests leave to withdraw as counsel for Plaintiff.

DATED: July 14, 2022

STEVEN S. BISS

By: /s/ Steven S. Biss  
Steven S. Biss (VSB # 32972)  
300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2022 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for the Defendant and all interested parties receiving notices via CM/ECF.

By: /s/ Steven S. Biss  
Steven S. Biss (VSB # 32972)  
300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiff*